



**Florida Strawberry  
Growers Association** <sup>SM</sup>

October 6, 2020

The Honorable Robert Lighthizer  
United States Trade Representative  
Office of the US Trade Representative  
600 17th Street, NW  
Washington, DC 20508

**Re: Request Under 19 USC § 2252(d)(1) to Monitor the Importation of Strawberries**

Dear Ambassador Lighthizer:

The Florida Fruit and Vegetable Association (FFVA), Florida Strawberry Growers Association (FSGA), and Florida Farm Bureau hereby request pursuant to 19 USC § 2252(d)(1) of Section 201 of the Trade Act of 1974, as amended (19 USC § 2251 *et seq.*) that US imports of strawberries (US HTS 810.10) be monitored under the perishable agricultural product provisions of 19 USC § 2252(d). This request is in furtherance of, and fully incorporates by reference, the September 1, 2020, *Report on Seasonal and Perishable Products in US Commerce* (“*September Report*”) issued by the Office of the United States Trade Representative (USTR), US Department of Commerce, and US Department of Agriculture.

FFVA is a trade association comprised of growers of seasonal and perishable products, including strawberries, and other agricultural products in Florida. It has served Florida’s specialty crop industry for more than 75 years.

FSGA represents the majority of strawberry growers in Florida, which is the largest producing region in the United States for winter-spring fresh market strawberries.

The Florida Farm Bureau is Florida’s largest general agricultural organization, representing more than 136,000 member-families.

The *September Report* states that USTR will work with domestic producers to request that the International Trade Commission (ITC) monitor and investigate imports of strawberries, which could enable an expedited Section 201 global safeguard investigation later this year. (*September Report*, at 17-21). With the undersigned entities hereby requesting the monitoring of strawberry imports, 19 USC § 2252(d) authorizes USTR to request that the ITC monitor and investigate strawberry imports if it determines that strawberries are a perishable agricultural product and that there is a reasonable indication that strawberries are being imported into the United States in such increased quantities as to be, or likely to be, a substantial cause of serious injury, or the threat thereof, to the domestic industry.

The *September Report* found that the written submissions received by USTR during the public comment period (85 *Fed. Reg.* 13973, 85 *Fed. Reg.* 17938, and 85 *Fed. Reg.*

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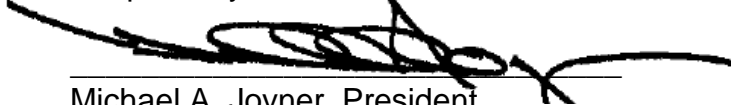
44354), and considerable testimony delivered at the August 13, 2020, hearing on this matter (Transcript: *Public Hearings Regarding Trade-Distorting Policies that may be Affecting Seasonal and Perishable Products in US Commerce*, Public Hearing, Aug. 13, 2020) contained a significant amount of information covering the 19 USC § 2252(d)(1) criteria as they relate to strawberry imports. It further states that this supportive information already on the record will facilitate an expeditious USTR response if an entity representing a domestic industry producing strawberries requests monitoring under 19 USC § 2252(d) (*September Report*, at 17).

On the issue of whether strawberries are a perishable agricultural product, the *September Report* properly cites to testimony confirming that Florida strawberries have a short marketing period (*Id.*). Florida strawberries have a marketing period that runs from December through April and have a short shelf life of seven days from date of harvest (when refrigerated).


With respect to strawberry imports and their impact on the domestic industry, the *September Report* sets forth US strawberry import data showing a 127% surge in import value between 2014 and 2019. The *September Report* also summarizes testimony confirming how the sharp increase in imports from Mexico has seriously injured the Florida industry in the form of significant lost sales and market share, unsustainably low unfair prices, greatly reduced production volumes, shuttered family farms, and a bleak outlook for the Florida strawberry sector. Attached to this letter is a fuller list of written submissions received by USTR pursuant to its public comment period, the content of which further confirms the enormous increase in strawberry imports from Mexico in recent years and the growing injury those imports have inflicted on Florida's strawberry industry.

Consistent with USTR's indication that this request will facilitate an expeditious USTR response, FFVA, FSGA, and the Florida Farm Bureau respectfully ask that USTR make an affirmative determination under 19 USC § 2252(d)(1) and request that the ITC monitor and investigate strawberry imports under section 332(g) of the Tariff Act of 1930 (19 USC § 1332(g)) in accordance with the provisions of 19 USC § 2252(d). FFVA, FSGA, and the Florida Farm Bureau stand ready to assist USTR further as necessary to commence this monitoring and investigation process.

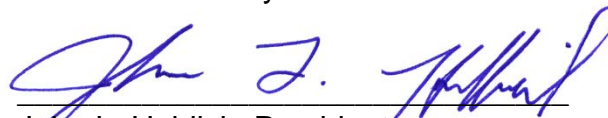
Respectfully submitted,



Michael A. Joyner, President  
Florida Fruit and Vegetable Association



Kenneth Parker, Executive Director  
Florida Strawberry Growers Association



John L. Hoblick, President  
Florida Farm Bureau

Attachment

**Written Submissions Further Confirming the Enormous Increase in  
Strawberry Imports from Mexico in Recent Years and the Growing Injury  
those Imports have Inflicted on Florida's Strawberry Industry**

<b>Submitting Entity</b>	<b>Date Submitted</b>
Florida Fruit and Vegetable Association	August 3, 2020 (Initial Comments) August 4, 2020 (Testimony)
Florida Strawberry Growers Association	August 3, 2020
Florida Farm Bureau Federation	August 3, 2020
Florida Department of Agriculture and Consumer Services	July 6, 2020 (Initial Comments) August 3, 2020 (Testimony)
Georgia Fruit and Vegetable Growers Association	August 2, 2020
New York Farm Bureau	August 3, 2020
Dade County Farm Bureau	June 19, 2020
University of Florida	August 3, 2020
University of Florida, IFAS	July 28, 2020
Manatee County Farm Bureau	July 24, 2020
Fancy Farms, Inc., Florida	July 21, 2020 (Initial Comments) July 31, 2020 (Testimony)
Leitz Farms LLC, Michigan	April 15, 2020 (Initial Comments) July 31, 2020 (Testimony)
Matt Harrison, Florida Grower	August 3, 2020
Diamond 99, Inc., Florida	March 30, 2020
Wish Farms, Florida	April 3, 2020
Suntastic Family Farms	August 3, 2020
Sizemore Farms	August 3, 2020
C&B Farm, Florida	August 1, 2020
Midway Farms, LLC	August 3, 2020
Mack Farms	August 3, 2020
Alger Farms Florida	March 14, 2020
Highland Ag Solutions	August 3, 2020
Clear Springs	August 3, 2020
FARM N 4 U	July 22, 2020
Gen 3 Produce	August 3, 2020
Lewis Taylor Farms, Inc.	August 3, 2020
Grimes Produce Company	July 22, 2020
Castillo Farms Group Corporation	August 3, 2020
Senator Marco Rubio	August 21, 2020
Representative Ross Spano	August 3, 2020
Representative Buddy Carter	August 21, 2020
Representative Al Lawson	August 3, 2020
Representative Alcee L. Hastings	August 3, 2020
Representative Debbie Mucarsel-Powell	August 3, 2020
Representative W. Gregory Steube	August 3, 2020
Thomas LaSalle, Palm Beach County, FL	July 31, 2020
Michelle Williamson, Dover, FL	August 3, 2020